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**From:** Tom Pace  
**Sent:** Friday, January 10, 2014 5:49 PM  
**To:** CEQA Guidelines  
**Subject:** SB 743 Developing Alternatives to LOS

In reviewing the various metrics studied to date by OPR, it seems that VMT is the best metric in terms of comprehensiveness, ease of use, and consistency with State policy objectives. It is important that the guidelines not create disincentives for infill development by perpetuating mitigation requirements for costly vehicular capacity improvements in already-congested urban areas, while facilitating sprawl development in uncongested open spaces at the urban fringe.

With respect to the final question in the Preliminary Evaluation relating to parking, I would suggest that the CEQA Guidelines should view over-provision of parking as more detrimental to the environment than under-provision of parking. Excessive parking supply discourages transit use and walking by incentivizing auto use; it also contributes to heat-island effects, urban runoff, visual blight, and light and glare from nighttime parking lot lighting.

Thomas Pace